

RICHARD PALMA
ATTORNEY AT LAW
122 EAST 42nd STREET - SUITE 620
NEW YORK, NEW YORK 10168

MEMBER OF THE BAR
NEW YORK

TEL. (212) 686-8111
FAX. (212) 202-7800
E-MAIL: rpalma177@gmail.com

April 19, 2022

ECF

Honorable Loretta A. Preska
United States District Judge
United States Courthouse for S.D.N.Y.
500 Pearl Street
New York, N.Y. 10007

Re: U.S. v. Olawale Olaniyan, Dkt. 21 Cr. 609 (LAP)
U.S. Pretrial Services Does Not Oppose Defense Motion Seeking the Below
Listed Modification of Conditions of Release.

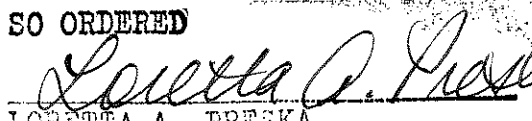
Dear Judge Preska:

For purposes of his new employment as a fleet driver and vehicle transporter with Avis Budget Rental, LLC, Mr. Olawale Olaniyan respectfully seeks a modification of his conditions of release specifically, the removal of a location monitoring device, curfew enforced by location monitoring, and travel restriction expanded to the lower 48 states so long as USPO Joshua Rothman notified before each business trip. As reported to U.S. Pretrial Officer Rothman, Mr. Olaniyan commenced his employment with this rent a car company on April 14, 2022. According to Mr. Olaniyan, his duties include driving and delivering vehicles across state lines to the company's various locations. This may include driving vehicles as far as Florida and California. After consulting with USPO Ashley Cosme, her office does not oppose this modification of release.

If there are any questions about this request, I am available to Your Honor immediately by cellular phone at (917) 751-5754.

Thank you.

SO ORDERED


LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

Respectfully submitted,
Richard Palma
Richard Palma

4/21/22